

TECHNICAL SUPPORT FOR ENFORCEMENT  
AT HAZARDOUS WASTE SITES

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**ENFORCEMENT  
SENSITIVE**

Monthly Progress Report No. 6 for the  
period: March 1 through March 31, 1984

**PRIVILEGED WORK PRODUCT PREPARED  
IN ANTICIPATION OF LITIGATION**

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, D.C. 20460

**ENFORCEMENT  
CONFIDENTIAL**

Contract No. 68-01-6769  
Work Assignment No. 84-85  
Effective Date: 7/22/83

Fuel Blending and Survey of Steel Production

April 1984

GCA CORPORATION  
GCA/TECHNOLOGY DIVISION  
Bedford, Massachusetts 01730

USEPA RCRA



3009256

## 1.0 WORK ASSIGNMENT DESCRIPTION

Based on the 16 December 1983 kick-off meeting, the approach to this program was detailed in a 9 January 1984 letter to EPA from GCA. The approach specified in the letter clarifies, so rather than replaces the Work Plan discussion. The program approach may be described as follows.

### 1.1 Technical Approach to Fuel Blending Study

#### 1.1.1 Task 1 - Select Facilities for Site Visits --

- Further define population, in Spokane, WA, Anchorage, and Boise, ID.
- Contact state/local regulatory staff for suggestions, additional contacts in Region.
- Submit recommendations to Region X for 10 - 15 facility inspections.
- Organize inspections with state/local agencies (announced versus unannounced visits at direction of state/local agency).
- Submit inspection questionnaire to Region X for approval.

#### 1.1.2 Task 2 - Conduct Facility Inspections --

- Objective: assess potential for hazardous waste being mixed with waste oil; determine if facility is subject to RCRA Interim Status Standards (noting flagrant violations) and determine compliance with regulations for recycled wastes.
- Approach:
  - Detailed conversation with owner/operator and state agency representative.
  - Inspect plant records, as available.
  - Inspect plant facilities - storage/treatment/blending units.
  - Develop process flow diagram with estimated throughput.
  - Identify waste oil generators, customers and competitors.
  - Photographs - on site if permission granted.
  - Assess waste oil sampling sites (no sample taken).
  - Complete checklist previously submitted to Region X for approval.

1.1.3 Task 3 - Prepare Letter Report --

- 1-5 typed page trip report for each facility in accordance with outline to be submitted to Region X for approval.
- For each facility, assess compliance and potential for hazardous waste/oil mixtures.
- Include summary section describing overall results, conclusions, and recommendations.

1.2 Technical Approach to Steel Production Facility Study

1.2.1 Task 1 - Clarify OSW's Definition of K061 --

- Discussion with Waste Characterization Branch in Headquarters.
- Clarify EPA's Definition of "Primary Steel Production" and discuss rationale.
- Submit memo to Region X describing electric arc furnace dust composition.

1.2.2 Task 2 - Inventory Region X Iron and Steel Production Facilities --

- Contact EPA/Seattle Air Enforcement Engineers.
- Reconcile EPA and industry trade association listing of Region X electric furnace installations (primary steel plus foundry). Call facility if necessary, to determine if still in business.
- Collect all available background information useful in assessing whether air pollution control device dust is potentially hazardous.
  - Plant description
  - Furnace process parameters
  - Scrap composition
  - Dust capture/handling equipment
- Submit memo to Region X describing results and recommend next step.

1.2.3 Task 3 - Plant Visits (Optional, at direction of Region X) --

- Define raw materials as indicator of potential for hazardous waste.
- Conduct typical EPA plant inspection.
- Brief trip reports.

EPA Coordinators: Mike Bussell - Region 10  
Madeline Nawar - HQ

Subcontractors: None

GCA Personnel: Norman Surprenant  
Peter Spawn  
Marc Grant  
Mark Breton

Deliverables: Monthly Progress Reports  
Draft Final Report - January 31, 1984\*  
Final Report - February 28, 1984\*

## 2.0 TECHNICAL OBJECTIVES FOR THE REPORTING PERIOD

March's objectives were to continue preparation of Trip Reports for the two-week field inspection program.

## 3.0 WORK ACCOMPLISHED/RESULTS ACHIEVED

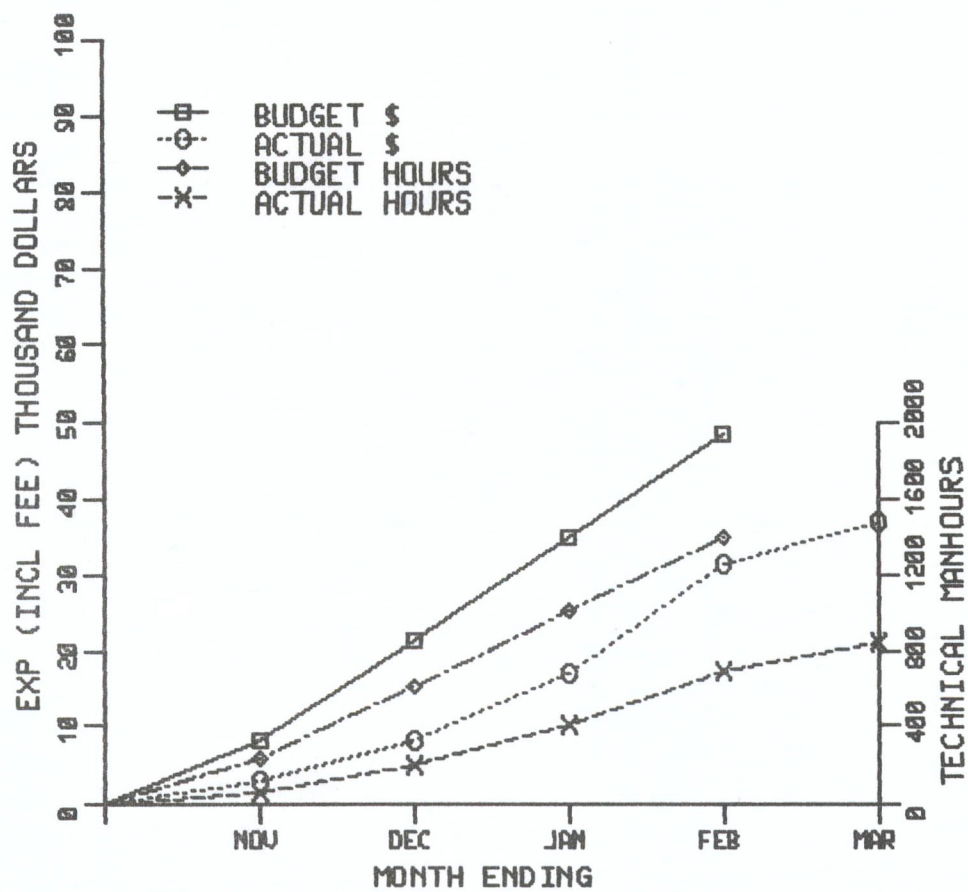
In March, trip reports were prepared for 14 of the 23 plants visited. A sample trip report was submitted to Region X for review. Comments were received from EPA and incorporated into report preparation. All waste oil trip reports will be completed in April and incorporated into a project summary report. All steel facility reports will be completed in late April. A second summary report will describe these analyses. These efforts will complete activity scheduled under the assignment. As of 30 March, technical labor hour (TLH) expenditures since project inception are waste oil: 623 TLH; iron and steel: 229 TLH.

## 4.0 PROBLEMS ENCOUNTERED AND REMEDIAL ACTIONS TAKEN

A time extension has been requested since the task kick-off meeting was delayed until 16 December 1984.

\*Region X has requested extension to 5/15/84.

CUMULATIVE PERFORMANCE  
 CONTRACT 68 01 6769 WA 84 85 GCA 1625085  
 TOTAL \$48351 TMH 1400





GCA CORPORATION  
Technology Division

213 Burlington Road  
Bedford, Massachusetts 01730  
Telephone: 617-275-5444  
Telex: 92-3339

23 April 1984

Environmental Protection Agency  
Office of Waste Programs Enforcement  
401 M Street, SW  
Washington, DC 20460

Attention: Elwood Martin (WH 527F)

Subject: Contract No. 68-01-6769, Work Assignment No. 84-85  
(GCA 1-625-085)

Gentlemen:

In accordance with the Reporting Requirements of the subject Assignment enclosed herewith is three (3) copies of the Monthly Progress Report for

Very truly yours,

Mary L. Atkinson  
Assistant Manager  
Contract Administration

MLA/ble

Enclosures (3)

cc: Marian Bernd  
(w/copy)

Charles Findley/Region X  
(w/copy)